

SM Exhibit CT

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X
4 ADRIAN SCHOOLCRAFT,
5 Plaintiff,

6 Case No:
7 - against - 10 CV 06005

8 THE CITY OF NEW YORK, ET AL.,
9 Defendants.

10 -----X
11 111 Broadway
12 New York, New York

13 April 11, 2014
14 10:21 a.m.

15
16 DEPOSITION OF WILLIAM GOUGH, pursuant to
17 Notice, taken at the above place, date and
18 time, before DENISE ZIVKU, a Notary Public
19 within and for the State of New York.
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(Continued.)

1 WILLIAM GOUGH

2 Q. How do you know that he briefed
3 the ESU?

4 A. I saw him talking to them.

5 Q. Is there anybody else in that
6 huddle?

7 MS. PUBLICKER METTHAM:

8 Objection. You could answer.

9 A. No.

10 Q. How many people from ESU was he
11 speaking to?

12 A. I believe it was two.

13 Q. What happened next?

14 A. I don't remember what happened
15 exactly in the sequence of events, but ESU
16 made entry.

17 Q. How did they make entry?

18 A. To the best of my knowledge,
19 they used a pass key given to them by the
20 landlord.

21 Q. When ESU made entry, where were
22 you?

23 A. Downstairs.

24 Q. On the street?

25 A. Like right at the front door.

1 WILLIAM GOUGH

2 It's a multiple dwelling.

3 Q. Who was in the building from the
4 NYPD, other than the ESU?

5 MS. PUBLICKER METTHAM:

6 Objection. You could answer.

7 A. I don't specifically remember
8 who was in the building. I know that I was
9 not. I was outside the front door, myself
10 and Sergeant Duncan.

11 Q. Where was Marino?

12 A. I don't know.

13 Q. Where was Lauterborn?

14 A. I don't know.

15 Q. What about Mauriello, do you
16 know where Mauriello was?

17 A. I do not know.

18 Q. Did there come a time when --
19 where was Hawkins?

20 MS. PUBLICKER METTHAM:

21 Objection. You could answer.

22 A. Don't know.

23 Q. Did there come a time when you
24 entered the building?

25 A. Yes.

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WILLIAM GOUGH

Q. Who -- describe how that happened?

MS. PUBLICKER METTHAM:

Objection. You could answer.

A. ESU came down the stairs and they said he's up there, meaning Officer Schoolcraft. I proceeded into the apartment with Sergeant Duncan.

Q. Was any EMS in the apartment when you got there?

A. Yes.

Q. Who else was in the apartment?

A. Captain Lauterborn.

Q. Anybody else?

A. Chief Marino.

Q. Anybody else?

A. Inspector Mauriello.

Q. Anybody else?

A. Those are the three that I specifically remember.

Q. So when the two ESU officers came down the stairs and they told you he's up there, right?

A. Yes.

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WILLIAM GOUGH

Q. Referring to Schoolcraft?

A. Yes.

Q. How were they attired?

MS. PUBLICKER METTHAM:

Objection. You could answer.

A. To the best of my recollection,
they had on their vests, their heavy vests
and helmets.

Q. They were wearing a heavy vest?

A. Yes.

Q. They had a helmet on their head?

A. Yes.

Q. These are the helmets that have
the dark visor?

MS. PUBLICKER METTHAM:

Objection. You can answer.

A. I don't specifically remember
the dark visor.

Q. Okay. Can you describe the
helmet for me, to the best of your ability?

MS. PUBLICKER METTHAM:

Objection. You could answer.

A. The old military type soup pot
type helmet.